



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 7

11201 Renner Boulevard  
Lenexa, Kansas 66219

NOV 17 2014

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Article No: 7006 2760 0000 8644 7012

Mr. Ray Netherton  
Manufacturing Engineering Manager  
Gomaco Corporation  
5913 E. Highway 175  
Ida Grove, Iowa 51445

RE: Gomaco Corporation – Plant 1  
Ida Grove, Iowa  
RCRA ID No.: IAD984568519  
And  
Gomaco Corporation – Plant 2  
Ida Grove, Iowa  
RCRA ID No.: IAD984568527

Dear Mr. Netherton:

Request for Information

On July 10, 2013, a representative of the U. S. Environmental Protection Agency (EPA) inspected your Plant 1 and Plant 2 Gomaco Corporation facilities. The inspection was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA).

My staff has reviewed the inspection reports and determined that violations of RCRA were documented. We are requesting additional information regarding your facility's compliance status. Enclosed is a list of questions and/or requested information. Also enclosed are instructions to be used in providing your response. Please carefully read and follow these instructions. Your response to this request in accordance with the instructions is required by Section 3007 of RCRA and substantial penalties may result from not complying. Please note that the EPA reserves its right to pursue appropriate enforcement actions, including penalties, for violations discovered as a result of the inspection, regardless of whether the violations were subsequently corrected.



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Within thirty (30) calendar days of receiving this letter, please mail your response to: Nicole Moran, AWMD/WEMM, U. S. Environmental Protection Agency, 11201 Renner Boulevard, Lenexa, Kansas 66219. To request an extension of the time limit, follow the instructions in the enclosure. Please direct all questions concerning this letter to Nicole Moran, of my staff, at (913) 551-7641.

Sincerely,

A handwritten signature in blue ink, appearing to read 'D. Toensing', is positioned above the printed name.

Donald Toensing, Chief  
Waste Enforcement and Materials Management Branch  
Air and Waste Management Division

Enclosures (2)

cc: Contaminated Sites Section Supervisor  
Iowa Department of Natural Resources

## Request for Information

### Plant 1

1. With regard to the two 55-gallon containers of waste paint that were located in the Plant 1 former paint kitchen and the 55-gallon container labeled "used gun cleaner" located outside the former paint kitchen, please provide the following information:
  - a. An explanation of how long these containers had been in storage and open. Please provide the month, year and date or an estimate.
  - b. An explanation on how these containers were managed following the inspection and any associated documentation (i.e., manifest). Please highlight the specific line on the manifest associated with this waste.

### Plant 2

2. EPA has reviewed the letter you provided dated October 31, 2011 and addressed to Mr. Gary Witkovski from Bobalee Hydraulics regarding Barium products at the Bobalee facility. This letter does not provide an adequate hazardous waste determination on the used paint booth filters and burnoff ash generated at your Plant 2 facility. Please provide the following information concerning your hazardous waste determination on these two waste streams:
  - a. a determination of whether or not the waste has been excluded from regulation under 40 CFR Part 261.4;
  - b. a determination of whether or not the waste has been listed as a hazardous waste in Subpart D of 40 CFR Part 261. **If the waste is a listed hazardous waste, please provide the applicable listed waste code(s) in your response;** and
  - c. a determination of whether or not the waste is identified in 40 CFR Part 261 Subpart C. To determine whether the waste exhibits any of the hazardous characteristics in Subpart C, the waste may need to be analyzed using one of the methods found in Subpart C of 40 CFR Part 261, or by applying knowledge of the waste characteristics based upon the materials or processes used. Any laboratory analyses used to make this determination must be provided to EPA as well as a detailed description as to how each sample was taken. **If the waste is a characteristic hazardous waste, please provide the applicable characteristic waste code(s) in your response.**
  - d. If your facility elects to apply knowledge of the material to make a waste determination on the waste streams identified above, you must provide a detailed explanation and your reasoning regarding the basis for this determination. **If you apply knowledge of the material to make the waste determination, please provide all applicable hazardous waste codes for the waste in your response.**
3. With regard to your generator status, you previously supplied EPA with still log sheets for May 1, 2013 – September 17, 2013. Please provide all record keeping documents, including:
  - a. Still log calculations for Plant 2 since September 17, 2013.
  - b. Any documentation showing the pounds of still bottoms generated per batch.

### **3007 RESPONSE INSTRUCTIONS**

- \* Identify the Person(s) responding to this request on your behalf.
- \* Address each numbered item separately, and precede each answer with the number of the item to which it responds.
- \* For each numbered item, identify all documents consulted, examined, or referred to in the preparation of the answer, or that contain information responsive to the requested item. Provide true, accurate, and legible copies of all such documents. (If information responsive to an item is available but there are no relevant source documents, you must still provide the information.)
- \* For each document provided, indicate on the document (or in some similar manner) the number of the item to which it responds.
- \* For each numbered item, identify all persons consulted in the preparation of the answer.
- \* For purposes of this request, the term "you" or "your" refers to the company, corporation and any officer, principal, agent employee, or any other person(s) associated in any capacity.
- \* If information responsive to a requested item is not in your possession, identify the person(s) from whom the information may be obtained.
- \* If information that is not known or available at the time you make your response later becomes known or available to you, you must supplement your response.
- \* If, at any time after you submit your response, you find that any part of the information you submitted is incomplete, false, or misrepresents the truth, you must notify the EPA immediately.
- \* You must provide the requested information even though you consider it confidential information or trade secrets. If you want to make a confidentiality claim covering part or all of the information submitted, identify the material with words such as "trade secret," "proprietary," or "company confidential."
- \* The EPA will disclose this information only to the extent and by the means described in 40 CFR Part 2, Subpart B., provided that it qualifies as confidential business information.
- \* A request for an extension to the time limit for responding must be in writing and must be postmarked within five (5) calendar days of receipt of this information request. Address it to the person identified in the cover letter to receive your response.
- \* Copies of the Code of Federal Regulations may be obtained from the U.S. Government Bookstores or on the Internet at [www.epa.gov/epahome/cfr40.htm](http://www.epa.gov/epahome/cfr40.htm).
- \* This request for information is not subject to the approval requirements of the Paperwork Reduction Act of 1980.
- \* The EPA encourages you to conserve resources. Suggested methods include use of recycled paper, printing on both sides (duplex printing), and when possible submitting documents electronically (i.e., email or compact discs). If hard copy submittals are necessary, please do not submit documents in binders.

Not responding to this information request within the stated time limit and in accordance with these instructions may subject your facility to an enforcement action which could include the imposition of penalties of up to \$37,500 per violation, per day of continued noncompliance. Providing false, fictitious, or fraudulent statements or representations could lead to criminal penalties.